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MEMORANDUM ENDORSED

December 14, 2022

VIA ECF

Hon. Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Stephen Gannon v. 521 Eighth Avenue LLC, et. al.

Case No.: 1:22-cv-00880-GHW

Dear Judge Woods:

This firm represents Defendant, 521 Eighth Avenue, LLC ("Defendant"), in the above-referenced matter. We write jointly with counsel for Plaintiff, Stephen Gannon ("Plaintiff"), to respectfully request a 23-day extension of the Parties deadline to submit a proposed case management plan, from December 14, 2022 to January 6, 2023.

The reason for the extension is that the Parties have been working diligently in seeking to resolve this case without further litigation, and we have recently reached a settlement in principle on most of the essential aspects of a potential resolution. The Parties anticipate resolving all terms of the settlement and we are hopeful that a formal settlement agreement will be executed shortly. We believe that an extension until January 6, 2023 will provide the Parties with sufficient time to consummate the settlement.

We thank Your Honor for all courtesies extended.

Ford & Huff, LC

/s/ Adam Ford

Adam Ford

cc: All Counsel of Record (*via* ECF)

Respectfully submitted,
Kaufman Dolowich & Voluck, LLP

Matthew Cohen
Solomon Abramov

Application granted in part. This letter asks for an extension of the time to file a case management plan, but fails to mention the reason that the parties were asked to provide not only a case management plan but also a joint letter to the Court: The initial pretrial conference scheduled for December 16, 2022. *See* Dkt. No. 43. Without these documents, the Court cannot adequately prepare for the conference. Accordingly, the initial pretrial conference previously scheduled for December 16, 2022, is hereby adjourned to February 15, 2023 at 4:00 p.m. The proposed case management plan *and* joint letter described in the Court's February 2, 2022 order, *see* Dkt. No. 5, are due no later than February 8, 2023.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 45.

SO ORDERED.

Dated: December 14, 2022
New York, New York

GREGORY H. WOODS
United States District Judge